

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.
SOUTHERN DISTRICT

SUPERIOR COURT

Docket No. 226-2021-CR-126

State of New Hampshire

v.

Julie Introcaso

**STATE'S ASSENTED-TO MOTION TO EXTEND TIME TO SEEK INDICTMENT AND
REQUEST FOR EXPEDITED STATUS HEARING**

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General, with this assented-to motion to extend the time in which the State must obtain an indictment in this matter until October 15, 2021. In support of this motion, the State submits the following:

1. The defendant is currently charged with two felony counts of falsifying physical evidence, RSA 641:6, and two class A misdemeanor counts of tampering with public records or information, RSA 641:7. A status hearing is presently scheduled for September 23, 2021.

2. New Hampshire Rule of Criminal Procedure 8(d)(2) requires that the Court “dismiss without prejudice and vacate all bail orders in such cases in which an indictment has not been returned within 90 days of the complaint being filed.” However, the Court can extend the 90-day deadline upon a motion filed by the prosecution seeking an extension of time “and explaining why the extension is necessary.” Id.

3. The State had previously sought and been granted an assented-to extension of the indictment deadline such that it currently expires on September 17, 2021. The State now seeks a further extension of the grand jury deadline to the October 2021 grand jury, specifically, October

Granted



Honorable Charles S. Temple
September 20, 2021

Clerk's Notice of Decision
Document Sent to Parties
on 09/22/2021

15, 2021. The further extension is requested to provide leave for the parties to continue their ongoing, substantive discussions concerning this matter, to include the possibility of a resolution, prior to indictment.

4. Counsel for the defendant, Michael A. Delaney, Esquire, assents to the requested extension.

WHEREFORE, the State of New Hampshire respectfully requests that this
Honorable Court:

- (A) Grant the State's assented-to motion;
- (B) Extend the State's grand jury indictment deadline to October 15, 2021; and
- (B) Grant such further relief as may be deemed just and proper.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

By its attorneys,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: September 17, 2021

/s/Geoffrey W.R. Ward
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent to Michael A. Delaney and Amanda E. Quinlan, Esquires, counsel of record for the defendant.

/s/Geoffrey W.R. Ward
Geoffrey W. R. Ward